

# Perry Law

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June 8, 2023

VIA ECF

Hon. Edgardo Ramos  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:** *Andrew M. Cuomo v. Lindsey Boylan*, 23-mc-00185 (ER)

Dear Judge Ramos:

We represent Respondent Lindsey Boylan in the above-captioned miscellaneous action concerning Movant Andrew M. Cuomo's motion to compel compliance with a subpoena seeking nonparty discovery in connection with *Trooper 1 v. New York State Police, et al.*, No. 22-cv-00893 (LDH) (TAM), which is pending in the Eastern District of New York. We write to advise the Court that Ms. Boylan consents to transfer this action to the Eastern District of New York pursuant to Fed. R. Civ. P. 45(f) based on Mr. Cuomo's agreement to the following briefing schedule:

- June 26, 2023 (extended from June 12, 2023): Ms. Boylan files opposition to compel and any cross motion.
- July 12, 2023: Mr. Cuomo files reply in support of motion to compel and opposition to any cross motion.
- July 24, 2023: Ms. Boylan files reply in support of any cross motion.

Accordingly, Ms. Boylan requests that the Court adopt the agreed-on briefing schedule and transfer the action to the Eastern District of New York. No prior requests for extensions have been made. We appreciate Your Honor's consideration of this request.

Sincerely,

/s/ E. Danya Perry  
E. Danya Perry  
Karen Friedman Agnifilo  
Rachel Fleder

*Attorneys for Respondent Lindsey Boylan*